



State of Kansas

Mike Hayden, Governor

Department of Health and Environment Southeast District Office

Stanley C. Grant, Ph.D., Secretary

1500 W. 7th, P.O. Box 888, Chanute, Kansas 66720-0888

(316) 431-2390

May 14, 1990

Mr. Lloyd Meeks, Quality Engineer
Teledyne Independence
P.O. Box 946
Independence, Kansas 67301



Re: Hazardous Waste Compliance Inspection
EPA Identification Number: KSD981712854

Generator

Dear Mr. Meeks:

On May 4, 1990, your facility was inspected to determine compliance with state hazardous waste regulations.

The inspection revealed that your facility generates the following hazardous wastes as defined by 40 CFR, Part 261, Subparts C & D as adopted by K.A.R. 28-31-3:

Wastes Generated	Waste Codes	Generation
1. 1,1,1 Trichloroethane	F001	400-500 lbs/month
2. Isopropyl alcohol	D001	420 lbs/month
3. Corrosive liquid--Turco	D002	570 lbs/month
4. Solvent--PD-680	D001	275 lbs/month
5. Calibrating fluid	D001	300 lbs/month

You are also handling and shipping the following wastes as hazardous wastes.

Waste Oakite-202	D002	480 lbs/month
Rinse water w/solvents	D001	1,166 lbs/month

Based on the information provided, the quantity of hazardous waste generated is more than 1,000 kilograms (approximately 2,200 pounds) per month. Your facility is, therefore, regulated under K.A.R. 28-31-4 excluding K.A.R. 28-31-4(h) and K.A.R. 28-31-4(m).

The waste analyses furnished to me at the time of the inspection indicated that the waste Oakite and waste rinse water are not hazardous wastes and therefore, could be hauled to the city wastewater system if you obtain the city's written permission.



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The inspection identified the following items not in compliance with state regulations concerning generators of hazardous waste:

1. The area around the satellite containers holding the waste calibrating fluid showed signs of the containers overflowing or spillage occurring when filling the barrel.

This area must be cleaned up. The contaminated soil must be placed in barrels and shipped off-site to the county landfill. You should contact Charles Linn, Kansas Department of Health and Environment, Bureau of Air & Waste Management, Topeka, Kansas 66620, to obtain authorization to haul this waste to the landfill.

2. The list of emergency equipment in your contingency plan did not give a brief outline of the equipment's capabilities (40 CFR, 265.52(e)).
3. Your personnel training documents did not include job titles and job descriptions for each position involved with the hazardous waste management program in accordance with 40 CFR, Part 265.16(d) as required by K.A.R. 28-31-4(g)(4).

Facility personnel were not taking part in an annual review of the initial hazardous waste training (40 CFR, 250.16(c)).

The above deficiencies must be corrected by no later than June 15, 1990. Please contact this office in writing once this has been accomplished.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning the inspection, please call me or contact the Kansas Department of Health and Environment, Bureau of Air & Waste Management in Topeka, phone 913/296-1500.

Sincerely yours,


William T. Towery, R.S.
Inspections & Enforcement Section
Bureau of Air & Waste Management

WTT:da

pc: Tom Gross, BAWM, Topeka
J. P. Goetz, BAWM, Topeka
SED, Chanute